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September 28, 2023

Honorable Steven I. Locke
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722
By: ECF

RE: Nin and Trischler v. County of Suffolk et al
Docket No. 19-cv-01546 (GRB)(SIL), and
Passalacqua and Klein v. County of Suffolk et al
Docket No. 19-cv-05738 (GRB)(SIL)

Dear Judge Locke:

As the Court is aware, the undersigned has been assigned as pro bono counsel to Plaintiffs in each of the above actions.

I write pursuant to the Court's Civil Conference Minute Order of July 31, 2023 which requested that the parties meet and confer and file a status report. Please allow this letter to serve as a joint status report on behalf of all parties to the action.

As required under the Court's July 31, 2023, Order, the undersigned obtained four file boxes containing outgoing counsel's physical files, scanned relevant materials and returned the boxes to Mr. Young. Additionally, counsel for each set of Defendants has provided responses to supplemental demands which we have served on behalf of the Plaintiffs. We are still in the process of reviewing Mr. Young's materials and the supplemental responses from Defendants and will follow up as required in the next month.

The parties have discussed scheduling and conducting depositions and would propose a deadline of the completion of depositions by December 31, 2023.

Based on the above, the parties would respectfully suggest returning to Court for a status conference in January and propose the following dates for the conference: January 8, 9, 10, 16, 17 or 18, 2024.

The parties thank the Court for its courtesies in this matter and look forward to meeting with the Court at the next Conference.

Respectfully Submitted,
HARFENIST KRAUT & PERLSTEIN, LLP

By: Neil Torczyner

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